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September 3, 1992

Ms. Donna Searcy
Secretary
Federal Communications Commission
Washington DC 20054

RE: MCI Telecommunications Corporation
Petition to Establish Policies and
Rules Pertaining to the Equal
Access Obligations of Cellular
Licensees (RM-8012)

RECEIVED

SEP - 3 1992

Federal Communications Commission
Office of the Secretary

Dear Ms. Searcy:

Herewith transmitted are an original and four copies each of a "Motion to Accept Late Filed Comments" and "Comments" of Telephone and Data Systems, Inc. ("TDS") and United States Cellular Corporation ("USCC") in the above-referenced proceeding.

In the event there are any questions, please contact the undersigned.

Sincerely,


Peter M. Connolly

No. of Copies rec'd 0+4
List A B C D E

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ORIGINAL

In the Matter of)
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Petition to Establish) RM-8012
Policies and Rules)
Pertaining to the)
Equal Access Obligations)
of Cellular Licensees)
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Federal Communications Commission
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MOTION TO ACCEPT LATE
FILED COMMENTS

Telephone and Data Systems, Inc. ("TDS") and its subsidiary United States Cellular Corporation ("USCC") hereby request that the FCC accept the attached comments in the above-referenced proceeding one day late.

It proved impossible to complete necessary client review prior to the 5:30 PM deadline yesterday. The submission of the Comments only one day late should not prejudice any other party and we submit that the FCC decision-making process will benefit from the information contained in the Comments.

Accordingly, it is respectfully requested that this Motion be granted.

Respectfully submitted,

TELEPHONE AND DATA SYSTEMS, INC.
UNITED STATES CELLULAR CORPORATION

By 
Peter M. Connolly

Koteen and Naftalin
1150 Connecticut Avenue NW
Washington DC 20036

September 3, 1992

Their Attorneys

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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SEP - 3 1992

Federal Communications Commission
Office of the Secretary

In the Matter of)
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Policies and Rules)
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Equal Access Obligations)
of Cellular Licensees)
)

COMMENTS OF TELEPHONE AND DATA SYSTEMS, INC.
AND UNITED STATES CELLULAR CORPORATION

Telephone and Data Systems, Inc. ("TDS") and its subsidiary United States Cellular Corporation ("USCC") hereby file their comments on the above-captioned petition filed by MCI Telecommunications Corporation. TDS and USCC strongly oppose MCI's proposal that all cellular licensees be required to connect with all interexchange carriers via uniform nationwide equal access procedures. Accordingly TDS and USCC believe that the FCC should not institute a rulemaking proceeding in which such a rule would be considered. MCI is proposing a self-interested and very costly "solution" to a non-existent problem. Its proposal should be rejected.

Background

USCC, through an operating subsidiary, placed its first cell in service in 1985, in the Knoxville, Tennessee MSA. USCC has since grown steadily, playing its part in development of cellular into an eight million customer, eight billion dollar industry.

At the present time USCC, through subsidiaries owns and/or operates cellular systems in 33 MSA and 82 RSA markets. It has 382

cells now in service and has constructed 45 switches. USCC owned and operated systems serve in excess of 42,000 customers and provide service to approximately 11,000 "roamers" on an average day. USCC's current fixed assets (that is, cells and switches) represent approximately \$172,000,000 in value. In 1993, USCC projects that it will spend approximately \$38 million on new construction and system upgrades.

In constructing its cellular systems, USCC has, we submit, served the public interest by doing its part to construct a national, "seamless," state of the art cellular network.

I. The MCI Petition Fails to Provide
Any Adequate Basis For Commission Action

TDS and USCC entirely agree with and support the arguments which are made by the Cellular Telecommunications Industry Association ("CTIA"), in its Comments to be filed in this proceeding.

Rather than reiterate those arguments, TDS and USCC will offer some data concerning the costs which equal access would impose on USCC's cellular systems. Those costs would be considerable and could only be justified by very considerable public benefits from requiring equal access, benefits which CTIA demonstrates would be non-existent.

During its seven years of providing cellular service to an ever expanding customer base, USCC has never received a single complaint or, to its knowledge, even an inquiry concerning rates for long distance service, which customers evidently perceive to be reasonable. USCC's cellular systems receive long distance service

from AT&T and USCC's customers are charged AT&T's standard long distance rates.

The "hardware and software" costs to USCC of providing equal access would be very considerable. At the present time, USCC has estimated its costs for implementing equal access in the following chart, which assumes that only three IXC's would interconnect with each of USCC's 45 switches:

Cost of providing Equal Access:

		Per Switch	USCC Switches	Total USCC
Hardware:	DTC (Digital Trunk Controller	\$22,500	45	\$1,012,500
per T1	Network Module	\$2,500	45	\$112,500
Software:	Equal Access	\$35,000	45	\$1,575,000
Facilities:	Average T1 Cost x 3 Average IXC's	\$15,600	45	\$702,000
per Year				
	1st year cost	\$75,600		\$3,402,000
	Recurring Costs	\$15,600		\$702,000

Assumptions: * Hardware Costs only reflect portion of Hardware dedicated to required T1 support.

* Average of 3 IXC's per market

Current Fixed Assets: (Switch, Cell Sites)
as of June 1992

RSA	\$99,000,000
MSA	\$73,000,000
Total	\$172,000,000
Next Years Budget:	\$38,000,000

As shown above, the total initial cost of mandatory interconnection per switch would be approximately \$75,600 and the total initial cost of interconnecting all 45 of USCC's switches would be approximately \$3,402,000. USCC's estimates its subsequent yearly per switch recurring costs at \$15,600 and thus estimates its total recurring yearly costs at \$702,000. Those costs would have to be paid out of USCC's budget for system improvements and USCC would have to curtail its expansion and upgrade plans by a comparable amount. USCC would also note that these costs do not include the managerial time which would have to be spent negotiating interconnection agreements with interexchange carriers, the legal fees which would be incurred, or the time USCC's technical personnel would have to spend implementing interconnection. Those costs would also be significant.

TDS's and USCC's resources, like those of other cellular licensees, are obviously finite. Money which has to be spent for interconnection with more than one interexchange carrier cannot be spent on cell site construction in large, sparsely populated RSAs, or on improving coverage in congested urban systems.

MCI has provided no evidence that requiring cellular systems to spend large sums of money for this purpose would be a more productive use of such resources than allowing cellular systems to improve their systems in accordance with their own plans.

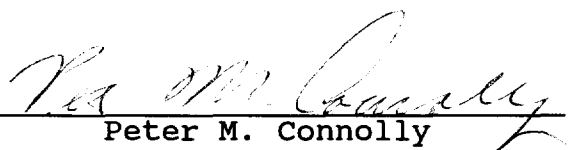
CONCLUSION

For the above reasons and for those given in CTIA's comments, the MCI petition should be dismissed.

Respectfully submitted,

TELEPHONE AND DATA SYSTEMS, INC.
UNITED STATES CELLULAR CORPORATION

By


Peter M. Connolly

Koteen and Naftalin
1150 Connecticut Avenue NW
Washington DC 20036

September 2, 1992

Their Attorneys